

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
ZACHARY T. WEBER	:	
Debtor,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:18-bk-01378-HWV
NATIONSTAR MORTGAGE LLC	:	
d/b/a MR. COOPER	:	
Movant,	:	
	:	
ZACHARY T. WEBER	:	
JESSICA F. WEBER	:	
CHARLES J. DEHART, JR	:	
Respondents.	:	

DEBTOR'S ANSWER TO CERTIFICATE OF DEFAULT

AND NOW COMES, Debtor, Zachary T. Weber, by and through his attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Certificate of Default and in support thereof states as follows:

1. Denied. The Debtor has made said payments to movement to cure the default before the notice was received. Undersigned counsel is waiting for proof from the Debtor and should have same available by the time of the hearing.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Certificate of Default and further requests any other relief deemed necessary and just.

Respectfully Submitted,
JACOBSON, JULIUS, & HARSHBERGER

Dated: September 20, 2020

s/Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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CERTIFICATE OF SERVICE

I, Colleen Reed, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to the Certificate of Default upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Kristen D Little Shapiro & DeNardo, LLC 3600 Horizon Drive, Suite 150 King of Prussia
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

s/ Colleen Reed

8150 Derry Street
Harrisburg, PA 17111
717.909.5858
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Email: creed@ljacobsonlaw.com

Dated: September 20, 2020